IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

CLARENCE J. GRAHAM,)	
Plaintiff,)	
v.)	Case No.: 4:17-cv-2263 CAS
UNIVERSITY CITY, MISSOURI, et al.)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF TIME TO COMPLY WITH ADR REFERRAL

COME NOW Plaintiff and Defendants (collectively, "the parties"), by and through their attorneys, and respectfully request an extension of 30 days to comply with ADR referral. In support, the parties state as follows:

- 1. On May 1, 2018, this Court entered its Order Referring the Case to Alternative Dispute Mediation. ECF 25. The case has been referred to mediation and the parties have been ordered to designate an agreed upon mediator by May 11, 2018. *Id*. The parties have been ordered to complete mediation before July 2, 2018. *Id*.
- 2. The parties are in active settlement negotiations and are hopeful that this case can be settled without formal mediation. Although the parties have agreed upon a mediator, they belief that the likelihood of settlement is better if they are able to reach an agreement without incurring the additional expenses of mediation.
- 3. Thus, the parties jointly request a 30-day extension of time to designate a mediator as well as to complete mediation. Designate would be due on June 11, 2018, with mediation to be completed by August 1, 2018.

WHEREFORE, the parties move this Court extend the time to designate a neutral to June 11,

2018 and the time to complete mediation to August 1, 2018.

Respectfully submitted,

/s/ Anthony E. Rothert

Anthony E. Rothert, #44827MO

Jessie Steffan, #64861MO

AMERICAN CIVIL LIBERTIES UNION OF

MISSOURI FOUNDATION

906 Olive Street, Suite 1130

St. Louis, Missouri 63101

Telephone: (314) 652-3114

Facsimile: (314) 652-3112 trothert@aclu-mo.org

jsteffan@aclu-mo.org

Gillian R. Wilcox, #61278MO

AMERICAN CIVIL LIBERTIES UNION OF

MISSOURI FOUNDATION

406 West 34th Street, Suite 420

Kansas City, Missouri 64111

Telephone: (816) 470-9933

Facsimile: (314) 652-3112

gwilcox@alcu-mo.org

ATTORNEYS FOR PLAINTIFFS

KING, KREHBIEL & HELLMICH, LLC

/s/ Blake D. Hill

Blake D. Hill, #58926MO

Robert J. Krehbiel #28616MO

2000 South Hanley Road

St. Louis, MO 63144-1524

Phone: 314-646-1110

Fax: 314-646-1122

rax. 314-040-1122

E-mail:bhill@kingkrehbiel.com E-Mail: rkrehbiel@kkhhb.com

ATTORNEYS FOR DEFENDANTS UNIVERSITY CITY, MO AND LARRY BECTON

CERTIFICATE OF SERVICE

I certify that on May 11, 2018, a copy of the foregoing was electronically filed with the Court using the CM/ECF system, which sent notification to counsel of record.

/s/ Anthony E. Rothert